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8 [REMAINING PARTIES ON SIGNATURE PAGE]

9

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 EROTIC SERVICE PROVIDER LEGAL
14 EDUCATION & RESEARCH PROJECT;
15 K.L.E.S.; C.V.; J.B.; AND JOHN DOE,

16 Plaintiffs,

17 v.

18 GEORGE GASCON, in his official capacity as
19 District Attorney of the City and County of San
Francisco; EDWARD S. BERBERIAN, JR., in
20 his official capacity as District Attorney of the
County of Marin; NANCY E. O'MALLEY, in
21 her official capacity as District Attorney of the
County of Alameda; JILL RAVITCH, in her
22 official capacity as District Attorney of the
County of Sonoma; and KAMALA D.
23 HARRIS, in her official capacity as Attorney
24 General of the State of California,

25 Defendants.

Case No.: 4:15-CV-01007 JSW

16 STIPULATION AND [PROPOSED]
17 ORDER VACATING THE CASE
18 MANAGEMENT CONFERENCE SET
19 FOR JUNE 12, 2015 AND SETTING A
20 BRIEFING AND HEARING SCHEDULE
21 ON MOTION TO DISMISS UNDER
22 FEDERAL RULE OF CIVIL
23 PROCEDURE 12(b)(6)
24 AS MODIFIED

Judge: The Hon. Jeffrey S. White
Dept: 5, 2d Floor
Trial Date: None Set
CMC Date: June 12, 2015
Action Filed: March 4, 2015

1 Pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, the Parties submit and stipulate to the
2 following:

3 WHEREAS, on March 4, 2015, Plaintiffs filed the operative complaint ("Complaint") in
4 this matter;

5 WHEREAS, on March 5, 2015, the Court set the Case Management Conference
6 ("CMC") in this matter for June 12, 2015, with a joint case management statement due on June
7, 2015;

8 WHEREAS, on March 13, 2015 and March 24, 2015, Plaintiffs sent notices of the
9 lawsuit and requests to waive service to the Defendants, as described in the Declaration of
10 Sharon L. O'Grady, filed herewith ("O'Grady Declaration" or "¶"), ¶¶ 3-4;

11 WHEREAS, Defendants intend to file a motion to dismiss the complaint in this action
12 pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure (*id.* ¶ 5);

13 WHEREAS, on March 30, 2015, the Parties met and conferred telephonically to discuss
14 waiver of service and a mutually acceptable briefing and hearing schedule on Defendant's
15 motion to dismiss the complaint, and a continuance of the CMC to allow the motion to be heard
16 first (*id.* ¶ 5);

17 WHEREAS, the Parties continued to meet and confer via electronic mail up and through
18 April 13, 2015, to confirm a briefing and hearing schedule for the motion to dismiss, and
19 consistent with the Court's calendar (*see id.* ¶ 6);

20 NOW, THEREFORE, the Parties hereby stipulate, and request that the Court order, as
21 follows:

- 22 1. The Court shall vacate the June 12, 2015 CMC and all corresponding deadlines and
filings;
- 23 2. Defendants' motion(s) to dismiss shall be filed no later than May 8, 2015;
- 24 3. Plaintiffs' opposition to the motion(s) to dismiss shall be filed no later than June 8,
2015;
- 25 4. Defendants' reply shall be due June 23, 2015; and

5. The hearing in this matter for the Court to address and hear the Parties' briefing shall
be set for ~~July 31~~^{August 7}, 2015, at 9:00 a.m. PT.

CONCLUSION

For the reasons set forth above, the Parties request that the Court vacate the current Case Management Conference set for June 12, 2015, and approve the above mentioned briefing schedule.

DATED: April 17, 2015 Respectfully Submitted,

KAMALA D. HARRIS
Attorney General of California
TAMAR PACTHER
Supervising Deputy Attorney General

By:/s/ _____
SHARON L. O'GRADY
Deputy Attorney General
Attorneys for Defendant Kamala D. Harris

DATED: April 17, 2015

DONNA R. ZIEGLER,
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County of Alameda

By /s/ _____
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DATED: April 17, 2015 DENNIS HERRERA
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By: /s/ WAYNE SNODGRASS
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9 DATED: April 17, 2015

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39 *Attorneys for Plaintiffs*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 20, 2015

The Honorable Jeffrey S. White
United States District Court Judge